

# **PART 70 OPERATING PERMIT**

## **OFFICE OF AIR MANAGEMENT**

**Nishikawa Standard Company**  
**501 High Road**  
**Bremen, Indiana 46506**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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|---|----------------|
| Operation Permit No.: T 099-7539-00041  |                |
| Issued by:<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Management | Issuance Date: |

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary rubber automotive weatherstripping coating source.

Responsible Official: Billy Burga  
Source Address: 501 High Road, Bremen, Indiana 46506  
Mailing Address: Indiana & Morrow Streets, Topeka, Indiana 46571  
SIC Code: 3069  
County Location: Marshall  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Four (4) spray booths, known as HS-1, HS-2, HS-3, and HS-4, each equipped with dry filters for overspray control, exhausted through S-1 through S-4 respectively, installed in 1989, capacity: 90 automotive rubber parts per hour, each.
- (b) One (1) robot spray booth, known as RS-7, equipped with dry filters for overspray control, exhausted through V-7, installed in 1994, increased capacity in 1995, capacity: 115 automotive rubber parts per hour.
- (c) Two (2) spray application booths, known as AS-1 and AS-2, equipped HVLP spray applicators and dry filters for overspray control, exhausted through Stack S-3 and S-4 respectively, installed in 1999, capacity 120 automotive rubber seals per hour, each.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (c) Units emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP: structural and production welding, parts washer emissions, combined rubber curing, and hand brush-on applications of coating materials. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]**

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### **B.2 Definitions [326 IAC 2-7-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3 Permit Term [326 IAC 2-7-5(2)]**

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### **B.4 Enforceability [326 IAC 2-7-7(a)]**

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### **B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### **B.6 Severability [326 IAC 2-7-5(5)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as no federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application forms, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:



Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:



- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (i) A brief description of the change within the source;
  - (ii) The date on which the change will occur;
  - (iii) Any change in emissions; and
  - (iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.22 Construction Permit Requirement [326 IAC 2]**

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

**B.23 Inspection and Entry [326 IAC 2-7-6(2)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

**B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]**

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Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

**B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e) failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

|               |
|---------------|
| Entire Source |
|---------------|

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC

14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.11 Monitoring Methods [326 IAC 3]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 20, 1999.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement



Nishikawa Standard Company  
Bremen, Indiana  
Permit Reviewer: MES

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shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements and Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) Four (4) spray booths, known as HS-1, HS-2, HS-3, and HS-4, each equipped with dry filters for overspray control, exhausted through S-1 through S-4 respectively, installed in 1989, capacity: 90 automotive rubber parts per hour, each.
- (b) One (1) robot spray booth, known as RS-7, equipped with dry filters for overspray control, exhausted through V-7, installed in 1994, increased capacity in 1995, capacity: 115 automotive rubber parts per hour.
- (c) Two (2) spray application booths, known as AS-1 and AS-2, equipped HVLP spray applicators and dry filters for overspray control, exhausted through Stack S-3 and S-4 respectively, installed in 1999, capacity 120 automotive rubber seals per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to CP 099-4049-00041 issued on January 25, 1995, BACT will be the continued use of robots High Volume Low Pressure (HVLP) coating application equipment with no control equipment. NISCO shall make all efforts to explore viable option for the use of low VOC, water-based coatings to further reduce VOC emissions from the coating operations. Reports of findings shall be submitted to the OAM at the end of each calendar year. When these coatings become available, NISCO shall substitute them for the current solvent-based coatings.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (b) Condition (4) of CP-099-2885-00041, issued on February 7, 1994, stated that the volatile organic compound content of the coatings delivered to the applicator shall be limited to 2.05 tons per month. This condition and its associated log in Condition (5) of CP-099-2885-00041 were not included in this permit since a subsequent BACT analysis was completed and pursuant to CP 099-4049-00041, BACT is as stated in D.1.1 (a), above.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) from the one (1) robotic spray booth (RS-7), four (4) hand spray booths (HS-1, HS-2, HS-3 and HS-4) as well as the two (2) spray application booths (AS-1 and AS-2) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

- (b) Condition 4a in CP 099-4049-00041 issued on January 25, 1995 that established a 0.9 pound per hour PM allowable emission rate for the robotic spray booth (RS-7) is not carried through to the proposed permit because there is a variable process weight rate.

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limits specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.5 Volatile Organic Compounds (VOC)**

VOC content referenced in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.6 Particulate Matter (PM)**

The dry filters for PM control shall be in operation at all times when any of the seven (7) spray booths (HS-1 - HS-4, RS-7, AS-1 and AS-2) are in operation.

**D.1.7 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-1, S-2, S-3, S-4 and V-7) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.8 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.6 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.9 Reporting Requirements**

A report of findings to explore viable option for the use of low VOC, water-based coatings to further reduce VOC emissions from the coating operations to document compliance with Condition D.1.1 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit shall be submitted to the OAM at the end of each calendar year.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (c) Units emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP: structural and production welding, parts washer emissions, combined rubber curing, and hand brush-on applications of coating materials.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.2.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding, grinding and machining operations shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour



### **Compliance Determination Requirement**

#### **D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Nishikawa Standard Company  
Source Address: 501 High Road, Bremen, Indiana 46506  
Mailing Address: Indiana & Morrow Streets, Topeka, Indiana 46571  
Part 70 Permit No.: T 099-7539-00041

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- ☒ Annual Compliance Certification Letter
- ☐ Test Result (specify) \_\_\_\_\_
- ☐ Report (specify) \_\_\_\_\_
- ☐ Notification (specify) \_\_\_\_\_
- ☐ Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Nishikawa Standard Company  
Source Address: 501 High Road, Bremen, Indiana 46506  
Mailing Address: Indiana & Morrow Streets, Topeka, Indiana 46571  
Part 70 Permit No.: T 099-7539-00041

**This form consists of 2 pages**

**Page 1 of 2**

|                            |  |
|----------------------------|--|
| Check either No. 1 or No.2 |  |
| <b>9</b>                   | 1. This is an emergency as defined in 326 IAC 2-7-1(12)<br><input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four <b>(4)</b> business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and<br><input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two <b>(2)</b> days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| <b>9</b>                   | 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)<br><input type="checkbox"/> The Permittee must submit notice in writing within ten <b>(10)</b> calendar days  |

If any of the following are not applicable, mark N/A

|   |
|---|
| Facility/Equipment/Operation:                       |
| Control Equipment:                                  |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency/Deviation:             |
| Describe the cause of the Emergency/Deviation:      |

If any of the following are not applicable, mark N/A

Page 2 of 2

|   |
|---|
| Date/Time Emergency/Deviation started:  |
| Date/Time Emergency/Deviation was corrected:  |
| Was the facility being properly operated at the time of the emergency/deviation?    Y    N<br>Describe:   |
| Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:   |
| Estimated amount of pollutant(s) emitted during emergency/deviation:  |
| Describe the steps taken to mitigate the problem:   |
| Describe the corrective actions/response steps taken:   |
| Describe the measures taken to minimize emissions:  |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Nishikawa Standard Company  
Source Address: 501 High Road, Bremen, Indiana 46506  
Mailing Address: Indiana & Morrow Streets, Topeka, Indiana 46571  
Part 70 Permit No.: T 099-7539-00041

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

| <b>Compliance Monitoring Requirement</b><br>(e.g. Permit Condition D.1.3) | <b>Number of Deviations</b> | <b>Date of Each Deviation</b> |
|---|-----------------------------|-------------------------------|
|   |                             |                               |
|   |                             |                               |
|   |                             |                               |
|   |                             |                               |
|   |                             |                               |
|   |                             |                               |

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Part 70 Operating Permit

**Source Name:** Nishikawa Standard Company  
**Source Location:** 501 High Road, Bremen, Indiana 46506  
**County:** Marshall  
**Part 70 Operating Permit:** OP T 099-7539-00041  
**SIC Code:** 3069  
**Permit Reviewer:** Mark L. Kramer

On August 25, 1999 the Office of Air Management (OAM) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that Nishikawa Standard Company had applied for a Part 70 Operating Permit to operate a stationary rubber automotive weatherstripping coating source. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On September 20, 1999, Allen Frutig of Nishikawa Standard Company submitted comments on the proposed Part 70 Operating Permit. The comments are as follows:

#### Comment 1:

Condition A.2, Emission Units and Pollution Control Equipment Summary: We would request that the descriptive word "hand" be removed from the first sentence of paragraph (a), such that the sentence would read "Four (4) spray booths, known as . . . ". We believe that this description may preclude our use of more efficient and lower emitting automatic equipment in the future.

#### Response 1:

Condition A.2(a) has been revised as shown below:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]  
This stationary source consists of the following emission units and pollution control devices:

- (a) Four (4) ~~hand~~ spray booths, known as HS-1, HS-2, HS-3, and HS-4, each equipped with dry filters for overspray control, exhausted through S-1 through S-4 respectively, installed in 1989, capacity: 90 automotive rubber parts per hour, each.

Similarly, Section D.1 has been revised.

#### Comment 2:

Condition B.11, Annual Compliance Certification: We would request that paragraph (c)(5), which requires that we include a listing of new insignificant activities with the annual compliance certification be deleted. We can find no authority in the Part 70 regulations of 325 IAC 2-7 for such a requirement.

**Response 2:**

The proposed Condition B.11(c)(5) does not require a listing of insignificant activities and was updated prior to public notice. The paragraph cited from the proposed permit is as follows:

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

Therefore, no change is required.

**Comment 3:**

Condition B.14, Permit Shield: The wording of paragraph (b) of this condition is somewhat ambiguous with respect to whether former Construction Permit conditions, which are not included in this permit may still be applicable. We would request that the condition be specifically amended to identify the fact that all of the conditions in the previously issued construction and operating permits are superceded by this permit.

**Response 3:**

This condition is almost exactly the wording required by 326 IAC 2-7-15. 40 CFR 70.6(f) states that the permitting authority may expressly include in a Part 70 permit a provision stating that compliance with the conditions of the permit shall be deemed in compliance with any applicable requirements. OAM believes non-applicable requirement determinations should be dealt with in Section D. OAM has also added language dealing with applicable requirements from prior permits. On July 28, 1998, the OAM was notified that the U.S. EPA would object to any Title V Operating Permit that superceded all previous construction permits. The U.S. EPA indicated that they believed that the authority for certain applicable requirements might expire if the construction permits that established them expired. The OAM believes that the regulatory process is best served if all affected parties are able to rely on the Title V Operating Permit to identify all applicable requirements and the means for demonstrating compliance with each requirement.

The OAM intends to continue discussions with the U.S. EPA regarding the issues related to past construction permits. However the OAM also believes that the Permit Shield condition B.14 (b) (1) and (2) establishes that the Title V permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of the permit shall be deemed in compliance with any applicable requirements as of the date of the permit issuance for all the previous permits identified by the source and the OAM during the course of this review.

**Comment 4:**

Condition C.1, Particulate Matter Emission Limitations for Processes with Process Weight Less Than One Hundred (100) Pounds Per Hour: We would request that this condition be removed, as it is not consistent with the applicable regulation. The process weight table found at 326 IAC 6-3 starts with a minimum process weight rate of 100 tons per year. The rule does not indicate that any limit would apply to process weights less than 100 pounds per hour. The rule does provide a formula for "interpolating" between values in the table, but not for "extrapolating" beyond the limits of the table. For this reason, we would request that this condition be deleted.

**Response 4:**

326 IAC 6-3-2 is applicable to operations at any process weight rate, unless a process is otherwise regulated by 326 IAC 6-1. There is nothing in this rule which states otherwise. Therefore, no change is required to this condition.

**Comment 5:**

Condition C.12, Emergency Reduction Plans: Attached is an Emergency Reduction Plan for this facility, which we believe satisfy the requirements for such plans. Please amend this condition to reflect that this plan has been submitted.

**Response 5:**

Due to the submittal of the Emergency Reduction Plan, the revised condition is:

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) ~~The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

(b) ~~These ERPs shall be submitted for approval to:~~

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

~~within ninety (90) days after the date of issuance of this permit.~~

~~The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

(c) ~~If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~

(d) ~~These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~

(e) ~~Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~

(f) ~~Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

(a) **The Permittee prepared and submitted written emergency reduction plans (ERPs)**



**consistent with safe operating procedures on September 20, 1999.**

- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.**
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.**
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.**
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]**

**Comment 6:**

Source Operation Condition C.14, Compliance Monitoring Plan - Failure to Take Response Steps:  
We do not believe that 40 CFR Part 70, or 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of non-compliance with an underlying applicable requirement, which is implied by this permit condition. We would request that all references to a Compliance Response Plan be eliminated from this condition.

**Response 6:**

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement.

The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

**Comment 7:**

Condition D.1.2 Preventive Maintenance Plan: We would request that this condition be amended to read as follows:

"A Preventive Maintenance Plan in accordance with Section B - Preventive Maintenance Plan of this permit, is required for the control devices for these facilities."

This proposed change would make it clear that the preventive maintenance plan is only required for the dry filters. We think that this is appropriate, since preventive maintenance on the production equipment itself would not effect emission levels.

**Response 7:**

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5. PMPs are not only for the control devices. Malfunctions in the coating equipment can also lead to excessive emissions. A malfunction of the HVLP spray applicators, which are required pursuant to 326 IAC 8-1-6, could lead to excessive VOC emissions. The HVLP spray applicators are required to operate normally as part of the Best Available Control Technology (BACT) determination pursuant to 326 IAC 8-1-6. Therefore, this condition has not been revised.

**Comment 8:**

D.1.5. Volatile Organic Compounds (VOC): We would request that this condition be removed from the permit since it is only relevant if there were a limit on the VOC content of the coatings used. Condition D.1.1 does not include a VOC limit, but instead requires specific spray coating technology be used.

**Response 8:**

While there is no specific VOC content requirement in Condition D.1.1, Condition D.1.5 cites the method required to verify the VOC content of any coatings used in these spray booths. Since NISCO is required to make all efforts to explore the viability of using low VOC water-based coatings pursuant to CP 099-4049-00041 issued January 25, 1995, this cite is appropriate to verify the VOC content of any coatings. Therefore, this condition has not been deleted.

**Comment 9:**

Condition D.1.7, and D.1.8, Compliance Monitoring and Record keeping Requirements: This condition requires daily filter inspections, weekly visible emission notations and monthly rooftop inspections for the dry filters on the surface coating operations. The allowable emission from the various spray booths would be less than 10 pounds per hour, and therefore we do not believe that compliance monitoring is warranted for these relatively small emission units.

**Response 9:**

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for paint booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, and opacity. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from

the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations was previously changed from daily to weekly prior to this comment. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition had been changed from weekly to monthly prior to this comment.

Therefore, these conditions will remain in the permit.

**Comment 10:**

Condition D.2.2, Volatile Organic Compounds (VOC): This condition is repetitive of Condition D.2.1, and would not be the applicable requirement for our parts washer, since it was installed in 1989. We would request that Condition D.2.2 be deleted.

**Response 10:**

Since 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) is not applicable to the degreaser at this source, Condition D.2.2 has been deleted.

~~D.2.2 Volatile Organic Compounds (VOC)~~

~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:~~

~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~

~~(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));~~

~~(B) The solvent is agitated; or~~

~~(C) The solvent is heated.~~

~~(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~

~~(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~

~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~

~~(5) Equip the degreaser with one (1) of the following control devices if the solvent vola-~~

~~tility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):~~

- ~~(A) — A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~
  - ~~(B) — A water cover when solvent is used is insoluble in, and heavier than, water.~~
  - ~~(C) — Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~
- ~~(b) — Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:~~
- ~~(1) — Close the cover whenever articles are not being handled in the degreaser.~~
  - ~~(2) — Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~
  - ~~(3) — Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

## Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

### Source Background and Description

**Source Name:** Nishikawa Standard Company  
**Source Location:** 501 High Road, Bremen, Indiana 46506  
**County:** Marshall  
**SIC Code:** 3069  
**Operation Permit No.:** T 099-7539-00041  
**Permit Reviewer:** Mark L. Kramer

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Nishikawa Standard Company relating to the operation of a rubber automotive weatherstripping coating source.

### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Four (4) hand spray booths, known as HS-1, HS-2, HS-3, and HS-4, each equipped with HVLP spray applicators and dry filters for overspray control, exhausted through S-1 through S-4 respectively, installed in 1989, capacity: 90 automotive rubber parts per hour, each.
- (b) One (1) robot spray booth, known as RS-7, equipped with HVLP spray applicators and dry filters for overspray control, exhausted through V-7, installed in 1994, increased capacity in 1995, capacity: 115 automotive rubber parts per hour.
- (c) Two (2) spray application booths, known as AS-1 and AS-2, each equipped HVLP spray applicators and dry filters for overspray control, exhausted through Stack S-3 and S-4 respectively, installed in 1999, capacity 120 automotive rubber seals per hour, each.

### Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

### New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

- (c) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (d) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment..
- (f) Paved and unpaved roads and parking lots with public access.
- (g) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (h) Emergency generators as follows:  
  
Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (i) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (j) Filter or coalescer media changeout.
- (k) Units emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP: structural and production welding, parts washer emissions, combined rubber curing, and hand brush-on applications of coating materials.
- (l) Units emitting greater than one (1) pound per day but less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs: individual brush application area.
- (m) Particulate emissions from 18 wheelers and cars on paved roads.
- (n) Units emitting less than 3 pounds per hour but less than 15 pounds per day of VOC: bonding line with superbond.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following: list permits, registrations, modifications, exemptions, etc.

- (a) Exemption CP 099-10577-00041, issued March 15, 1999;
- (b) CP 099-4049-00041, issued on January 25, 1995;
- (c) CP 099-2885-00041, issued on February 7, 1994;
- (d) R 099-2573-00041, issued on November 10, 1992, and

- (e) Registered Construction and Operation Status Letter, dated October 5, 1989.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) CP-099-2885-00041, issued on February 7, 1994

Condition (4): The volatile organic compound content of the coatings delivered to the applicator shall be limited to 2.05 tons per month.

Reason not incorporated: This condition and its associated log in Condition 5 were not included since a subsequent BACT analysis was completed and pursuant to CP 099-4049-00041 issued on January 25, 1995, Condition 6 supercedes these conditions.

- (b) CP-099-4049-00041, issued on January 25, 1995

Condition (4a): PM emissions from the process weight do not exceed 0.9 pounds per hour pursuant to 326 IAC 6-3-2.

Correction of original TSD calculation: On page 1 of 3 of the Emissions Calculation for CP 099-4049-00041, the process is stated as 150 pounds per hour and using the following equation yields: 0.723 pounds per hour, rather than 0.9 pounds per hour.

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information was received on August 28, September 9 and 14, 1998 and February 1, 1999.

A notice of completeness letter was mailed to the source on January 8, 1997.

### Emission Calculations

See pages 1 and 2 of 2 of Appendix A of this document for detailed emissions calculations.



### Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

| Pollutant        | Potential Emissions<br>(tons/year) |
|------------------|------------------------------------|
| PM               | 4.07                               |
| PM <sub>10</sub> | 4.07                               |
| SO <sub>2</sub>  | negligible                         |
| VOC              | 102                                |
| CO               | negligible                         |
| NO <sub>x</sub>  | negligible                         |

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

| HAPs               | Potential Emissions<br>(tons/year) |
|--------------------|------------------------------------|
| Xylene             | 0.703                              |
| Toluene            | 27.8                               |
| Phthalic Anhydride | 0.434                              |
| Ethyl Benzene      | 0.179                              |
| Hydroquinone       | 0.217                              |
| Glycol Ethers      | 2.15                               |
| TOTAL              | 31.4                               |

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data for the criteria pollutants and reflect the HAPs data summarized in the application received on December 13, 1996. The applicant has confirmed that due to changes in materials since the application was completed, the potential HAPs are less than the actual HAPs reported in the following table.

| <b>Pollutant</b>  | <b>Actual Emissions<br/>(tons/year)</b> |
|-------------------|---|
| PM                | 0.00                                    |
| PM <sub>10</sub>  | 0.00                                    |
| SO <sub>2</sub>   | 0.00                                    |
| VOC               | 8.34                                    |
| CO                | 0.00                                    |
| NO <sub>x</sub>   | 0.00                                    |
| MEK               | 2.29                                    |
| Toluene           | 30.9                                    |
| Methylenebis      | 0.003                                   |
| Chlorobenzene     | 0.049                                   |
| Xylenes           | 7.51                                    |
| Cyanide Compounds | 2.77                                    |
| MIBK              | 4.52                                    |
| Glycol Ethers     | 13.2                                    |
| Benzene           | 0.0001                                  |
| Propylene Imine   | 0.0002                                  |
| Methanol          | 0.0002                                  |
| Hydroquinone      | 0.016                                   |
| n-Hexane          | 0.003                                   |

### Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

|   | Limited Potential to Emit<br>(tons/year) |                  |                 |      |      |                 |      |
|---|--|------------------|-----------------|------|------|-----------------|------|
| Process/facility  | PM                                       | PM <sub>10</sub> | SO <sub>2</sub> | VOC  | CO   | NO <sub>x</sub> | HAPs |
| Surface Coating Booths<br>HS-1 - HS-4, RS-7, AS-1<br>& AS-2 | 0.396                                    | 0.396            | 0.00            | 102  | 0.00 | 0.00            | 25.6 |
| Insignificant Activities                                    | 3.00                                     | 3.00             | 1.00            | 10.0 | 2.00 | 3.00            | 5.00 |
| Total Emissions   | 3.40                                     | 3.40             | 1.00            | 112  | 2.00 | 3.00            | 30.6 |

### County Attainment Status

The source is located in Marshall County.

| Pollutant        | Status     |
|------------------|------------|
| PM <sub>10</sub> | attainment |
| SO <sub>2</sub>  | attainment |
| NO <sub>2</sub>  | attainment |
| Ozone            | attainment |
| CO               | attainment |
| Lead             | attainment |

Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60 applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this source.

The degreasing operation, deemed an insignificant activity, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T (40 CFR 63.460-469) since no halogenated HAP solvents are used.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

This source located in Marshall County is a minor source under PSD Rules since none of the criteria pollutants have a potential to be emitted at a rate of two hundred and fifty (250) tons per year or greater and it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds in Marshall County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

#### **326 IAC 5-1 (Opacity)**

This source is subject to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 2-1-3.4 (New source toxics control)**

The construction of spray application booths (AS-1 and AS-2) does not fit the definition of "to construct a major source" which is defined in CFR Part 63.41 (Definitions) as, "to fabricate, erect, or install at any developed site a new process or production unit which in and of itself emits or has the potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAPs." The reason the definition does not apply to this new construction is because the potential HAPs emissions from both booths combined are only 0.60 tons per year. The remaining five (5) spray booths were constructed and permitted prior to the applicability date of June 29, 1998 and therefore the rule does not apply to the existing source.

#### **326 IAC 2-7-5(13) (Preventive Maintenance Plan)**

A Preventive Maintenance Plan is required for the one (1) robotic spray booth or each one of the four (4) hand spray booths or each of the two (2) spray application booths and their dry filters.

326 IAC 2-7-6(1),(6) (Testing Requirements)

The Permittee is not required to test these facilities. However, IDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. Testing is not required in the proposed permit since there are no VOC control devices.

326 IAC 6-3 (Process Operations)

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the four (4) hand spray booths, known as HS-1, HS-2, HS-3, and HS-4, and the two (2) spray application booths, known as AS-1 and AS-2, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Condition 4a in CP 099-4049-00041 issued on January 25, 1995 that established a 0.9 pound per hour PM allowable emission rate for the robotic spray booth (RS-7) is not carried through to the proposed permit because there is a variable process weight rate.

326 IAC 8-1-6 (New facilities: general reduction requirements)

- (a) Robotic Spray Booth (RS-7)

Pursuant to CP 099-4049-00041 issued on January 25, 1995, BACT will be the continued use of robots High Volume Low Pressure (HVLP) coating application equipment with no control equipment. NISCO shall make all efforts to explore viable option for the use of low VOC, water-based coatings to further reduce VOC emissions from the coating operations. Reports of findings shall be submitted to the OAM at the end of each calendar year. When these coatings become available, NISCO shall substitute them for the current solvent-based coatings.

- (b) Four (4) Hand Spray Booths (HS-1 - HS-4)

The four (4) hand spray booths coat rubber automotive parts and are operated in parallel, i.e., no rubber automotive parts are applied a coating in more than one (1) booth. Since the potential VOC emissions are 12.6 tons per year from each booth which is less than the applicability level of twenty-five (25) tons per year, 326 IAC 8-1-6 is not applicable.

- (c) Two (2) Spray Application Booths (AS-1 & AS-2)

In addition, the total VOC potential from the two (2) parallel spray application booths that coat rubber automotive seals is 17.0 tons per year, and therefore, this rule is not applicable.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The one (1) robotic, four (4) hand spray and two (2) spray application booths have applicable compliance monitoring conditions as specified below:

- (a) The dry filters for PM control shall be in operation at all times when any of the seven (7) spray booths are in operation.
- (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating spray booth Stacks S-1 through S-4 and V-7 while one or more of the spray booths are in operation.
- (c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground.

These monitoring conditions are necessary to comply with the limits established by 326 IAC 6-3-2 and 326 IAC 2-7.

## Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations in Appendix A on page 2 of 2.

### **Conclusion**

The operation of this rubber automotive weatherstripping coating source shall be subject to the conditions of the attached proposed Part 70 Permit No. T 099-7539-00041.

Appendix A: Potential Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations

Company Name: Nishikawa Standard Company  
Address City IN Zip: 501 High Road, Bremen, Indiana 45606  
Part 70: T 099-7539  
Plt ID: 099-00041  
Reviewer: Mark L. Kramer  
Date: December 13, 1996

| Material   | Density<br>(lbs/gal) | Weight %<br>Volatile<br>(H2O &<br>Organics) | Weight %<br>Water | Weight %<br>Organics | Volume %<br>Water | Volume %<br>Non-Vol<br>(solids) | Gal of Mat<br>(gal/unit) | Maximum<br>(unit/hour) | Flash-off<br>(fraction) | Pounds VOC<br>per gallon<br>of coating<br>less water   | Pounds VOC<br>per gallon<br>of coating | Potential<br>VOC pounds<br>per hour | Potential<br>VOC pounds<br>per day | Potential<br>VOC tons<br>per year | Particulate<br>Potential<br>tons per year | lb VOC<br>/gal<br>solids | Transfer<br>Efficiency |
|--|----------------------|---|-------------------|----------------------|-------------------|---------------------------------|--------------------------|------------------------|-------------------------|--|--|-------------------------------------|------------------------------------|-----------------------------------|---|--------------------------|------------------------|
| Hand Spray Booths 1-4<br>Each Booth  |                      |   |                   |                      |                   |                                 |                          |                        |                         |  |  |                                     |                                    |                                   |   |                          |                        |
| Fum Primer   | 7.38                 | 93.50%                                      | 0.0%              | 93.5%                | 0.0%              | 6.50%                           | 0.0006                   | 90.000                 | 1.000                   | 6.90   | 6.90                                   | 0.37                                | 8.94                               | 1.63                              | 0.03                                      | 106.16                   | 75%                    |
| Thixon 814-1   | 7.01                 | 78.50%                                      | 0.0%              | 78.5%                | 0.0%              | 21.50%                          | 0.0006                   | 90.000                 | 1.000                   | 5.50   | 5.50                                   | 0.30                                | 7.13                               | 1.30                              | 0.09                                      | 25.59                    | 75%                    |
| Blackmax   | 9.17                 | 87.90%                                      | 0.0%              | 87.9%                | 0.0%              | 12.10%                          | 0.0003                   | 90.000                 | 1.000                   | 8.06   | 8.06                                   | 0.22                                | 5.22                               | 0.95                              | 0.03                                      | 66.62                    | 75%                    |
| RCT-N9206 (Chemtrend)  | 6.80                 | 83.81%                                      | 0.0%              | 83.81%               | 0.0%              | 12.49%                          | 0.0048                   | 90.000                 | 1.000                   | 5.70   | 5.70                                   | 2.46                                | 59.09                              | 10.78                             | 0.52                                      | 45.63                    | 75%                    |
| Isopropanol  | 6.59                 | 100.00%                                     | 0.0%              | 100.0%               | 0.0%              | 0.00%                           | 0.0007                   | 90.000                 | 1.000                   | 6.59   | 6.59                                   | 0.42                                | 9.96                               | 1.82                              | 0.00                                      | n/a                      | 100%                   |
|  |                      |   |                   |                      |                   |                                 |                          |                        |                         | Worst Case Plus Clean-up<br>Subtotal 4 Parallel Booths |  | 2.88                                | 69.05                              | 12.60                             | 0.52                                      |                          |                        |
| Robot Spray Booth RS-7   |                      |   |                   |                      |                   |                                 |                          |                        |                         |  |  | 11.51                               | 276.21                             | 50.41                             | 2.08                                      |                          |                        |
| Fum  | 7.60                 | 83.40%                                      | 0.0%              | 83.4%                | 0.0%              | 16.60%                          | 0.0070                   | 115.000                | 1.000                   | 6.34   | 6.34                                   | 5.13                                | 123.16                             | 22.48                             | 1.12                                      | 38.18                    | 75%                    |
| Fum Primer   | 7.38                 | 98.30%                                      | 0.0%              | 98.3%                | 0.0%              | 1.70%                           | 0.0034                   | 115.000                | 1.000                   | 7.25   | 7.25                                   | 2.80                                | 67.28                              | 12.28                             | 0.05                                      | 426.74                   | 75%                    |
| Booth AS-1   |                      |   |                   |                      |                   |                                 |                          |                        |                         |  |  |                                     |                                    |                                   |   |                          |                        |
| RCT-N9206 (Chemtrend)  | 6.80                 | 83.81%                                      | 0.0%              | 83.81%               | 0.0%              | 12.49%                          | 0.0048                   | 120.000                | 1.000                   | 5.70   | 5.70                                   | 3.28                                | 78.78                              | 14.38                             | 0.69                                      | 45.63                    | 75%                    |
| Booth AS-2   |                      |   |                   |                      |                   |                                 |                          |                        |                         |  |  |                                     |                                    |                                   |   |                          |                        |
| RCT-N9206 (Chemtrend)  | 6.80                 | 83.81%                                      | 0.0%              | 83.81%               | 0.0%              | 12.49%                          | 0.00087                  | 120.000                | 1.000                   | 5.70   | 5.70                                   | 0.59                                | 14.28                              | 2.61                              | 0.13                                      | 45.63                    | 75%                    |
|  |                      |   |                   |                      |                   |                                 |                          |                        |                         | AS-1 & AS-2<br>Robot RS-7                              | Subtotal<br>Subtotal                   | 3.88<br>7.93                        | 93.06<br>190.43                    | 16.98<br>34.75                    | 0.82<br>1.17                              | 91.26                    |                        |
| State Potential Emissions  |                      |   |                   |                      |                   |                                 |                          |                        |                         |  |  | Total                               |                                    | 23.32                             | 559.71                                    | 102.15                   | 4.07                   |
| Add worst case coating to all solvents   |                      |   |                   |                      |                   |                                 |                          |                        |                         |  |  |                                     |                                    |                                   |   |                          |                        |
| Usage in the Robot Spray Booth has been corrected by multiplying actual usage by 1.6 to obtain potential |                      |   |                   |                      |                   |                                 |                          |                        |                         |  |  |                                     |                                    |                                   |   |                          |                        |

| Control Technology Emissions (Combustion)                           |        |                      |                      |               |                 | Emission Factors |                |                             |               |                           |               |                                      |                                     |                              |                                      |               |
|---|--------|----------------------|----------------------|---------------|-----------------|------------------|----------------|-----------------------------|---------------|---------------------------|---------------|--------------------------------------|-------------------------------------|------------------------------|--------------------------------------|---------------|
| Type  | Number | Capacity<br>MMBtu/hr | Gas usage<br>MMCF/yr | PM<br>lb/MMCF | PM10<br>lb/MMCF | SO2<br>lb/MMCF   | NOx<br>lb/MMCF | VOC<br>lb/MMCF              | CO<br>lb/MMCF |                           | PM<br>tons/yr | PM10<br>tons/yr                      | Emissions<br>SO2<br>tons/yr         | NOx<br>tons/yr               | VOC<br>tons/yr                       | CO<br>tons/yr |
| Catalytic   |        |                      | 0.0                  | 3.0           | 3.0             | 0.6              | 100.0          | 5.3                         | 35.0          |                           | 0.0           | 0.0                                  | 0.0                                 | 0.0                          | 0.0                                  | 0.0           |
| Thermal   |        |                      | 0.0                  | 3.0           | 3.0             | 0.6              | 140.0          | 2.8                         | 20.0          |                           | 0.0           | 0.0                                  | 0.0                                 | 0.0                          | 0.0                                  | 0.0           |
| Total   |        |                      | 0.0                  |               |                 |                  |                |                             |               |                           | 0.0           | 0.0                                  | 0.0                                 | 0.0                          | 0.0                                  | 0.0           |
|   |        |                      |                      |               |                 |                  |                |                             |               | Control Efficiency<br>VOC | PM            | Controlled<br>VOC pounds<br>per hour | Controlled<br>VOC pounds<br>per day | Controlled<br>VOC<br>tons/yr | Controlled<br>Particulate<br>tons/yr |               |
|   |        |                      |                      |               |                 |                  |                | AS-1, AS-2 &<br>Robot Spray | Hand Spray    | 0.00%                     | 90.00%        |                                      |                                     |                              |                                      |               |
|   |        |                      |                      |               |                 |                  |                |                             | Robot Spray   | 0.00%                     | 91.00%        |                                      |                                     |                              |                                      |               |
| Controlled Emissions due to Surface Coating Operations and Controls |        |                      |                      |               |                 |                  |                |                             |               | Total After Controls      |               | 23.3                                 | 559.7                               | 102.1                        | 0.396                                |               |

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* Flash-off

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day) \* Flash-off

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs) \* Flash-off

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids) \* Flash-off

Total = Worst Coating + Sum of all solvents used



## HAP Emission Calculations

Company Name: Nishikawa Standard Company  
 Plant Location: 501 High Road, Bremen, Indiana 45606  
 Part 70: : T 099-7539  
 Plt ID: 099-00041  
 County: Marshall  
 Permit Reviewer: Mark L. Kramer  
 Date: December 13, 1996

| Material                      | Density<br>(lb/gal) | Gal of Mat<br>(gal/unit) | Maximum<br>(unit/hour) | Weight %<br>Xylene | Weight %<br>Toluene | Weight %<br>Phthalic<br>Anhydride | Weight %<br>Ethyl<br>Benzene | Weight %<br>Hydroquinone | Weight %<br>Glycol Ethers | Weight % | Xylene<br>Emissions<br>(tons/yr) | Toluene<br>Emissions<br>(tons/yr) | Phthalic<br>Anhydride<br>Emissions<br>(tons/yr) | Ethyl<br>Benzene<br>Emissions<br>(tons/yr) | Hydroquinone<br>Emissions<br>(tons/yr) | Glycol Ethers<br>Emissions<br>(tons/yr) | Total HAPs<br>Emissions<br>(tons/yr) |
|-------------------------------|---------------------|--------------------------|------------------------|--------------------|---------------------|-----------------------------------|------------------------------|--------------------------|---------------------------|----------|----------------------------------|-----------------------------------|---|--|--|---|--------------------------------------|
| <b>Hand Spray Booths 1-4</b>  |                     |                          |                        |                    |                     |                                   |                              |                          |                           |          |                                  |                                   |   |  |  |   |                                      |
| <b>Total All 4 Booths</b>     |                     |                          |                        |                    |                     |                                   |                              |                          |                           |          |                                  |                                   |   |  |  |   |                                      |
| Fum Primer                    | 7.38                | 0.000600                 | 360.00                 | 0.00%              | 83.00%              | 0.00%                             | 0.00%                        | 0.00%                    | 0.00%                     |          | 0.00                             | 5.80                              | 0.00  | 0.00                                       | 0.00                                   | 0.00                                    |                                      |
| Thixon 814-1                  | 7.01                | 0.000600                 | 360.00                 | 10.60%             | 0.00%               | 0.00%                             | 2.70%                        | 0.00%                    | 0.00%                     |          | 0.70                             | 0.00                              | 0.00  | 0.18                                       | 0.00                                   | 0.00                                    |                                      |
| Blackmax                      | 9.17                | 0.003000                 | 360.00                 | 0.00%              | 0.00%               | 1.00%                             | 0.00%                        | 0.50%                    | 0.00%                     |          | 0.00                             | 0.00                              | 0.43  | 0.00                                       | 0.22                                   | 0.00                                    |                                      |
| RCT - N9206 (Chemtrend)       | 6.80                | 0.004800                 | 360.00                 | 0.00%              | 0.00%               | 0.00%                             | 0.00%                        | 0.00%                    | 3.00%                     |          | 0.00                             | 0.00                              | 0.00  | 0.00                                       | 0.00                                   | 1.54                                    |                                      |
| Isopropanol                   | 6.59                | 0.000700                 | 360.00                 | 0.00%              | 0.00%               | 0.00%                             | 0.00%                        | 0.00%                    | 0.00%                     |          | 0.00                             | 0.00                              | 0.00  | 0.00                                       | 0.00                                   | 0.00                                    |                                      |
| <b>Robot Spray Booth RS-7</b> |                     |                          |                        |                    |                     |                                   |                              |                          |                           |          |                                  |                                   |   |  |  |   |                                      |
| Fum                           | 7.60                | 0.007040                 | 115.00                 | 0.00%              | 43.00%              | 0.00%                             | 0.00%                        | 0.00%                    | 0.00%                     |          | 0.00                             | 11.59                             | 0.00  | 0.00                                       | 0.00                                   | 0.00                                    |                                      |
| Fum Primer                    | 7.38                | 0.003360                 | 115.00                 | 0.00%              | 83.00%              | 0.00%                             | 0.00%                        | 0.00%                    | 0.00%                     |          | 0.00                             | 10.37                             | 0.00  | 0.00                                       | 0.00                                   | 0.00                                    |                                      |
| <b>Booth AS-1</b>             |                     |                          |                        |                    |                     |                                   |                              |                          |                           |          |                                  |                                   |   |  |  |   |                                      |
| RCT - N9206 (Chemtrend)       | 6.80                | 0.004800                 | 120.00                 | 0.00%              | 0.00%               | 0.00%                             | 0.00%                        | 0.00%                    | 3.00%                     |          | 0.00                             | 0.00                              | 0.00  | 0.00                                       | 0.00                                   | 0.51                                    |                                      |
| <b>Booth AS-2</b>             |                     |                          |                        |                    |                     |                                   |                              |                          |                           |          |                                  |                                   |   |  |  |   |                                      |
| RCT - N9206 (Chemtrend)       | 6.80                | 0.000870                 | 120.00                 | 0.00%              | 0.00%               | 0.00%                             | 0.00%                        | 0.00%                    | 3.00%                     |          | 0.00                             | 0.00                              | 0.00  | 0.00                                       | 0.00                                   | 0.09                                    |                                      |

Total State Potential Emissions **Worst Case HAPs in Booths 1-4 + Robot Spray Booth RS-7 and Booths AS-1 & 2**

|                |                   |              |               |              |              |              |              |               |
|----------------|-------------------|--------------|---------------|--------------|--------------|--------------|--------------|---------------|
| <b>TOTALS:</b> | <b>(tons/yr):</b> | <b>0.703</b> | <b>27.750</b> | <b>0.434</b> | <b>0.179</b> | <b>0.217</b> | <b>2.152</b> | <b>31.435</b> |
|                | <b>(lb/hr):</b>   | <b>0.161</b> | <b>6.336</b>  | <b>0.099</b> | <b>0.041</b> | <b>0.050</b> | <b>0.491</b> |               |
|                | <b>(g/sec):</b>   | <b>0.020</b> | <b>0.798</b>  | <b>0.012</b> | <b>0.005</b> | <b>0.006</b> | <b>0.062</b> |               |

## METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs